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December 11, 2019

VIA ECF

The Hon. Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square, Room 1305
New York, NY 10007

Re: *Vasquez, et al. v. Hong Kong and Shanghai Banking Corporation, Ltd., et al.*
1:18-CV-01876-PAE-BM

Dear Judge Engelmayer:

Pursuant to Protective Order (docket 96) the Plaintiffs renew their request that Exhibits 1, 2, 3, 4, 6 and 8 filed concurrently with the Declaration of Julio J. Ramos be filed under seal. Exhibit 1 includes bank account opening documents with account number and personal identification numbers redacted. Exhibits 2, 3 and 4 are agreements between HSBC Group affiliates, they have been redacted to the maximum extent possible so as to minimize the disclosure of operational details. Lastly, Exhibits 6 and 8 are summaries of wire transfer transactions. The account numbers and beneficiary information have been provisionally redacted from the documents. The formatting for Exhibit 8's redaction and highlighted versions are slightly different due to the fact that the document was produced in protected excel mode and direct redactions in the document are not possible, thus two versions of the document were printed for redaction and highlighting purposes. Plaintiffs request that the documents be allowed to be filed under seal pursuant to Order of the Court.

Respectfully submitted,

LAW OFFICES OF JULIO J. RAMOS

By: */s/ Julio J. Ramos*
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Counsel for Plaintiffs Rigoberto Vasquez and
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The Court has reviewed plaintiffs' proposed redactions for Exhibits 1, 2, 3, 4, 6, and 8. The Court grants plaintiffs' request and directs plaintiffs to file the redacted versions of Exhibits 1, 2, 3, 4, 6, and 8 on the public docket by Friday, December 27, 2019. By that same date, plaintiffs are also instructed to file under seal the unredacted versions of each of these exhibits.

SO ORDERED.


PAUL A. ENGELMAYER 12/23/2019
United States District Judge